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September 28, 2016

***Via ECF***

Honorable Joel Schneider, U.S.M.J.  
United States District Court,  
District of New Jersey  
Mitchell H. Cohen U.S. Courthouse  
1 John F. Gerry Square  
Camden, New Jersey 08101

**Re: *In Re Riddell Concussion Reduction Litigation***  
**Civil Action No. 13-07585 (JBS) (JS)**

Dear Judge Schneider,

This letter is filed by Plaintiffs to request that Plaintiffs' Class Certification Deadline as set out in Doc. 148 be extended. Plaintiffs have conferred with Defendants and Defendants do not oppose Plaintiffs' request.

The parties are nearing the end of the discovery period for class certification issues. By the end of next week, five of the Plaintiffs (or their representatives) will have been deposed and four of Defendant's employees or representatives will have been deposed. However, the second and final 30(b)(6) representative for Defendant (Allison Boersma) cannot be deposed until October 12, 2016, due to her work schedule. The current deadline to submit Plaintiffs' Motion for Class Certification is October 31, 2016. See Doc. 148.

In light of the fact that expert reports will be submitted with the Class Certification Brief, it is important that Plaintiffs have time to obtain and review the testimony of the remaining 30(b)(6) representative prior to preparing and submitting their brief. As such, Plaintiffs request that the deadline to file their Motion for Class Certification be extended to November 15, 2016. Plaintiffs submit the attached proposed Amended Scheduling Order as Exhibit A.

Honorable Joel Schneider, U.S.M.J.

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Plaintiffs hereby request that the Court enter the proposed Amended Scheduling Order to promote the just and expedient adjudication of this case, but also provide the appropriate time necessary to litigate a case of this magnitude.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO

*/s/ James E. Cecchi*

JAMES E. CECCHI

JEC/ljt

cc: All Counsel of Record (via ECF)

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

In re: RIDDELL CONCUSSION  
REDUCTION LITIGATION

NORMA D. THIEL, et al.,

Plaintiffs,

v.

RIDDELL, INC., et al.,

Defendants.

Civil Action No. 13-7585 (JBS-JS)

**SECOND AMENDED SCHEDULING ORDER**

The Court having considered Plaintiffs' Unopposed Letter to Extend Plaintiffs' Class Certification Deadline,

IT IS this \_\_\_\_\_ day of \_\_\_\_\_, 2016, hereby **ORDERED**:

1. Plaintiffs' unopposed request to extend the deadline for Plaintiffs' Motion for Class Certification, previously set for October 31, 2016, is **granted**; and

2. Plaintiffs' Motion for Class Certification shall be filed by **November 15, 2016**.

\_\_\_\_\_  
JOEL SCHNEIDER  
United States Magistrate Judge